



9.10 POLLUTION PREVENTION

BACKGROUND

The Source Reduction Unit (SRU) of the Office of Pollution Prevention and Technology Development, is available to assist permit writers with any source reduction question. Assistance can include participation in pre-application meetings with facility operators, obtaining copies of source reduction documents, developing compliance schedules for facilities that have not prepared their SB 14 documents, or developing pollution prevention information to be included with public notice materials. The SRU can be reached at (916) 322-3670.

Prior to issuing a Permit, the permit writer must determine if the applicant is covered by the Hazardous Waste Source Reduction and Management Review Act of 1989 (SB 14). SB 14 requires larger quantity generators (on-site facilities) to prepare and maintain source reduction documents. If the applicant is affected, the permit writer must ensure that the appropriate documents have been prepared and are complete.

SB 14 requires large quantity generators (those producing greater than 12,000 kilograms/year of hazardous waste) to prepare and maintain three source reduction documents. The three documents are the Source Reduction Evaluation Review and Plan (Plan), the Hazardous Waste Management performance Report (Report) and the Summary Progress Report (SPR). These must be prepared by September 1, 2003 and every four years thereafter. Facilities must maintain each document on site while only the SPR must be submitted to DTSC on or before the September due date. Small businesses must also prepare and submit an SPR to DTSC by the same due date if they generate greater than 12,000 kilograms/year of hazardous waste.

Verifying submittal of an SPR to DTSC is the first step in determining SB 14 generator compliance. DTSC also recognizes the submittal of an SPR as verifying that a facility has a program in place to reduce hazardous waste generation. HSC Section 25202.9 requires as a permit condition, on-site permitted facilities to annually certify that they have a P2 program established to reduce hazardous waste generation. The SRU can provide the permit writer with source reduction assistance at any point in the review process upon request. Specifically, the SRU will make the program in place determination and verify SB 14 compliance at the request of the permit writer. The permit writer should also look at the source reduction implementation schedule in SB 14 documents to identify opportunities to incorporate source reduction measures into the permit. If no source reduction implementation schedule exists in the SB 14 documents then ask the SRU to work with the permit writer to identify appropriate measures.

POLLUTION PREVENTION CHECKLIST

- (1) Does the facility annually generate more than 12,000 kilograms of hazardous waste or 12 kilograms of extremely hazardous waste? If yes,

the facility is likely captured by SB 14. The facility must also be an on-site generator. Off-site generators are specifically exempt from the SB 14 program under Health and Safety Code Section 25244.15 (d)(3). Call the SRU for assistance in the following areas:

- (2) Has the facility submitted an SPR to the SRU? This would verify that the generator has a program in place to reduce hazardous waste generation in accordance with Health and Safety Code Section 25202.9
- (3) Is the facility a small business? Reference: Section 11342 of the California Government Code. Specific information may also be found in the SB 14 Guidance Manual or by contacting the SRU directly.
- (4) Has the facility prepared a Plan? Has the facility (small business only) prepared a Compliance Checklist as their Plan?
- (5) Has the facility prepared a Report? Has the facility (small business only) prepared a U.S. EPA Biennial Generator Report as their Report?
- (6) Has the SRU determined that the documents are in compliance?
- (7) Does the CEQA document for the permit include unmitigated significant adverse environmental impacts that may be mitigated through pollution prevention measures? If yes, then the final CEQA document could be amended to include pollution prevention as a mitigation measure. Mitigation measures can then be added to the permit as a condition. Contact the SRU for assistance.
- (8) Does the permit application reflect parallel descriptions (process, waste streams, pollution prevention measures) to those in the SB 14 documents?
- (9) Do the SB 14 documents identify opportunities to incorporate source reduction measures into the permit?

If the permit writer has questions or needs assistance regarding any of the above items or SB 14 in general, contact the SRU. The SRU can be reached at (916) 322-3670.